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Ultimate Fighting Championship and UFC*

16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 Cung Le, Nathan Quarry, Jon Fitch,  
19 Brandon Vera, Luis Javier Vazquez,  
20 and Kyle Kingsbury on behalf of  
21 themselves and all others similarly  
22 situated,

23 **Plaintiffs,**

24 **v.**

25 Zuffa, LLC, d/b/a Ultimate Fighting  
26 Championship and UFC,

27 **Defendant.**  
28

Case No.: 2:15-cv-01045-RFB-(BNW)

**ZUFFA, LLC'S MOTION TO SEAL  
ECF NO. 879-70**

1 Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-  
2 5(b), and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on  
3 February 10, 2016 (ECF No. 217), Zuffa, LLC (“Zuffa”) hereby moves this Court for leave to  
4 lodge Exhibit 70 to the Motion for Summary Judgment by Defendant Zuffa, LLC (ECF No. 879-  
5 70) under seal.

6 The original exhibit filed at ECF No. 879-70 is an unredacted version of the  
7 expert report of Dr. Hal J. Singer. The unredacted version contains references to a document that  
8 was previously clawed back by non-party Deutsche Bank on the basis of privilege. *See* ECF No.  
9 727. “Courts generally accept attorney-client privilege and the work-product doctrine as a  
10 ‘compelling reason’ justifying a motion to seal.” *See Allstate Ins. Co. v. Belsky*, 2023 WL  
11 5275203, at \*3 (D. Nev. Aug. 16, 2023) (quoting *In re Anthem, Inc. Data Breach Litig.*, 2018  
12 WL 3067783, at \*3 (N.D. Cal. Mar. 16, 2018) and finding “compelling reasons” to seal “a  
13 contractual agreement between two third parties” that was “marked privileged”).

14 Along with this motion, Zuffa filed a Notice of Corrected Image/Document that  
15 attached a corrected version of Exhibit 70 that cures the deficiency in the original version and  
16 redacts information related to the Deutsche Bank document.

17 Zuffa now asks the Court to seal the earlier version of the exhibit (ECF No. 879-  
18 70) in order to protect the confidential information. Zuffa has conferred with counsel for  
19 Plaintiffs, and they do not oppose this motion.

20 DATED this twenty-first day of December, 2023.

1 Dated: December 21, 2023

Respectfully Submitted,

2  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing **Zuffa, LLC's**  
**Motion to Seal ECF No. 879-70** was served on December 21, 2023 via the Court's CM/ECF  
electronic filing system addressed to all parties on the e-service list.

/s/ William A. Isaacson  
William A. Isaacson